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IN THE UNITED STATES DISTRICT COURT U.S. DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE MID. DIST. TENN.  
NASHVILLE DIVISION

Sterling R Rivers Name

Prison Id. No. 463624

\_\_\_\_\_  
Name

Prison Id. No. \_\_\_\_\_

Plaintiff(s)

v.

Jeffrey Scott Name

\_\_\_\_\_  
Name

Defendant(s)

(List the names of all the plaintiffs  
filing this lawsuit. Do not use "et  
al." Attach additional sheets if  
necessary.)

Civil Action No. \_\_\_\_\_  
(To be assigned by the Clerk's  
office. Do not write in this space.)

Jury Trial ☒ Yes ☐ No

(List the names of all defendants  
against whom you are filing this  
lawsuit. Do not use "et al." Attach  
additional sheets if necessary.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS  
FILED PURSUANT TO 42 U.S.C. § 1983

I. PREVIOUS LAWSUITS (The following information must be provided by each plaintiff.)

- A. Have you or any of the other plaintiffs in this lawsuit filed any other lawsuits in the United States District Court for the Middle District of Tennessee, or in any other federal or state court?

☒ Yes NA ☐ No

- B. If you checked the box marked "Yes" above, provide the following information:

1. Parties to the previous lawsuit:

Plaintiffs Sterling R Rivers

Defendants E. Karpellis D. Merideth B. Gentry V. Dulin ABL Management Inc  
Metropolitan Government of Nashville and Davidson County  
D. Weikal T. Walker D. Steely P. Denton L. Frawley D. Blaylock  
V. McCullough R. Cogdill M. Warren C.D. White J. Compton T. Wright  
C. Allen T. Henson

2. In what court did you file the previous lawsuit? The Middle District of TN Nashville Division  
(If you filed the lawsuit in federal court, provide the name of the District. If you filed the lawsuit in state court, provide the name of the state and the county.)
3. What was the case number of the previous lawsuit? NA
4. What was the Judge's name to whom the case was assigned? NA
5. When did you file the previous lawsuit? I'm filing the same day as this one, (Provide the year, if you do not know the exact date.)
6. What was the result of the previous lawsuit? For example, was the case dismissed, appealed, or still pending? I guess still pending I'm filing it at the same time as this suit.
7. When was the previous lawsuit decided by the court? NA (Provide the year, if you do not know the exact date.)
8. Did the circumstances of the prior lawsuit involve the same facts or circumstances that you are alleging in this lawsuit.
- ☐ Yes ☒ No

(If you have filed more than one prior lawsuit, list the additional lawsuit(s) on a separate sheet of paper, and provide the same information for the additional lawsuit(s).)

II. THE PLAINTIFF'S CURRENT PLACE OF CONFINEMENT (The following information must be provided by each plaintiff.)

- A. What is the name and address of the prison or jail in which you are currently incarcerated? Davidson County Sheriff Offices Criminal Justice Center
- B. Are the facts of your lawsuit related to your present confinement?
- ☐ Yes ☒ No
- C. If you checked the box marked "No" in question II.B above, provide the name and address of the prison or jail to which the facts of this lawsuit pertain.
- Willson County Sheriff Department, or Willson County Jail
- D. Do the facts of your lawsuit relate to your confinement in a Tennessee State Prison?
- ☐ Yes ☒ No

If you checked the box marked "No," proceed to question II.H.

E. If you checked the box marked "Yes" in question II.D above, have you presented these facts to the prison authorities through the state grievance procedure?

☐ Yes NA ☐ No

F. If you checked the box marked "Yes" in question II.E above:

1. What steps did you take? NA

2. What was the response of prison authorities? NA

G. If you checked the box marked "No" in question II.E above, explain why not. I bonded out and I was not yet knowledgeable of the violation.

H. Do the facts of your lawsuit pertain to your confinement in a detention facility operated by city or county law enforcement agencies (for example, city or county jail, workhouse, etc.)?

☒ Yes ☐ No

I. If you checked the box marked "Yes" in question II.H above, have you presented these facts to the authorities who operate the detention facility?

☐ Yes ☒ No

J. If you checked the box marked "Yes" in question II.I above:

1. What steps did you take? NA

2. What was the response of the authorities who run the detention facility? NA

L. If you checked the box marked "No" in question II.I above, explain why not. I made bond before I found out my rights was violated

Attach copies of all grievance related materials including, at a minimum, a copy of the grievance you filed on each issue raised in this complaint, the prison's or jail's response to that grievance, and the result of any appeal you took from an initial denial of your grievance.

### III. PARTIES TO THIS LAWSUIT

A. Plaintiff(s) bringing this lawsuit:

1. Name of the first plaintiff: Sterling R Rivers

Prison Id. No. of the first plaintiff: 463624

Address of the first plaintiff: Davidson County Sheriff  
Office Criminal Justice Center P.O. Box 196383 Nashville TN 37219-  
(Include the name of the institution and mailing address, including zip code. 6383  
If you change your address you must notify the Court immediately.)

2. Name of second the plaintiff: NA

Prison Id. No. of the second plaintiff: NA

Address of the second plaintiff: NA

(Include the name of the institution and mailing address, including zip code.  
If you change your address you must notify the Court immediately.)

If there are more than two plaintiffs, list their names, prison identification numbers, and addresses on a separate sheet of paper.

B. Defendant(s) against whom this lawsuit is being brought:

1. Name of the first defendant: Jeffrey Scott

Place of employment of the first defendant: Lebanon Police Department  
406 Tennessee Blvd

The first defendant's address: 406 Tennessee Blvd Lebanon,  
TN 37087

Named in official capacity? ☒ Yes ☐ No

Named in individual capacity? ☒ Yes ☐ No

2. Name of the second defendant: ~~Lebanon~~ Lebanon Police Department

Place of employment of the second defendant: ~~Lebanon~~ Lebanon Police  
Department

The second defendant's address: ~~Lebanon~~ 406 Tennessee Blvd  
Lebanon TN 37087

Named in official capacity? ☒ Yes ☐ No

Named in individual capacity? ☒ Yes ☐ No

If there are more than two defendants against whom you are bringing this lawsuit, you must list on a separate sheet of paper the name of each additional defendant, their place of employment, their address, and the capacity in which you are suing them. If you do not provide the names of such additional defendants, they will not be included in your lawsuit. If you do not provide their proper name, place of employment, and address, the Clerk will be unable to serve them should process issue.

#### IV. STATEMENT OF FACTS

State the relevant facts of your case as briefly as possible. Include the dates when the incidents or events occurred, where they occurred, and how each defendant was involved. Be sure to include the names of other persons involved and the dates and places of their involvement.

If you set forth more than one claim, number each claim separately and set forth each claim in a separate paragraph. Attach additional sheets, if necessary. Use 8 1/2 in. x 11 in. paper. Write on one side only, and leave a 1 in. margin on all four sides.

(see sheets Attached)

#### V. RELIEF REQUESTED: Specify what relief you are requesting against each defendant.

- A. Award compensatory damages in the following amount: \$50,000 dollars severally against defendant Jeffrey Scott for Emotional Distress, Pain and Suffering and Mental Anguish sustained as a result of his part in violation of Plaintiff Rivers Rights to the Constitution.
- B. Award Punitive damages in the following Amounts of 50,000 from Defendant Jeffrey Scott.
- C. Award compensatory damages in the following amount: \$50,000 dollars severally against Lebanon Police Department for Emotional Distress, Pain and Suffering, and mental Anguish sustained as a result of the Defendant part in violation of Plaintiff rights to the constitution.
- D. I request a jury trial. ☒ Yes ☐ No
- E. Award Punitive damages in the following amount of \$50,000 from Defendant LPD.

VI. CERTIFICATION

I (we) certify under the penalty of perjury that the foregoing complaint is true to the best of my (our) information, knowledge and belief.

Signature: Sterling R Rivers Date: 5-14-12

Prison Id. No. 463624

Address: D.C.S.O CJC P.O.Box 196383 Nashville, TN  
37219-6383

(Include the city, state and zip code.)

Signature: NA Date: NA

Prison Id. No. NA

Address: NA

(Include the city, state and zip code.)

ALL PLAINTIFFS MUST SIGN AND DATE THE COMPLAINT, and provide the information listed above. If there are more than two plaintiffs, attach a separate sheet of paper with their signatures, dates, prison identification numbers, and addresses.

ALL PLAINTIFFS MUST COMPLETE, SIGN, AND DATE SEPARATE APPLICATIONS TO PROCEED IN FORMA PAUPERIS, if not paying the civil filing fee.

SUBMIT THE COMPLAINT, THE REQUIRED FILING FEE, OR APPLICATION TO PROCEED IN FORMA PAUPERIS, TOGETHER. Complaints received without the required filing fee or application to proceed *in forma pauperis* will be returned. Filing fees, or applications to proceed *in forma pauperis*, received without a complaint will be returned.



## 1<sup>st</sup> of 8 <sup>IV</sup> STATEMENTS OF FACTS

On or about April 5<sup>th</sup> 2011, I recorded a 3<sup>rd</sup> district County Commissioner buying narcotics. On the same month of April, I presented that recording to a lawyer in Lebanon, TN. (See Exhibit I) The lawyer called the FBI with my permission, so that something can be done about corruption of some officers and Government officials. My lawyer from Lebanon told me that an FBI agent asked if I would get on the stand and testify against the commissioner, and I said "yes." My lawyer said, "the agent said that he would call back, so call me tomorrow to see what he say." I said, "OK." I called the next day and my lawyer said, "the agent hasn't called back, so call again tomorrow to see if the agent called." I said, "OK." I called my Lawyer the next day and he said, "the agent still hasn't gotten back with me yet, just call me next week and if he haven't called yet, I will call him again." I said, "OK." I didn't understand why the agent didn't make an immediate response to these accusations. On June 5<sup>th</sup> 2011, I Plaintiff Sterling R Rivers was passenger riding in a vehical that got pulled over on sparta pike highway in Lebanon, TN. (See Exhibit 4) I viewed an undercover agent inside an unmarked vehical behind a black and white police car that had me and the driver pulled over. The officer was given valid license, registration, and insurance. The officer went

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to his car two times and then asked to search the car. I asked, "why did you pull us over?" Officer Scott said, "because your window tint is too dark." I told officer Scott, "no sir, I don't think there is any reason for you to search the car when you're saying you pulled us over for tinted windows." (Even though I knew the officer didn't pull us over for tinted windows, because as we (David Valentine and I) saw the unmarked undercover car, (later known to be SA Shields) behind the black and white police car that already had its lights on before David and I was turning off the interstate.) (See Exhibit V) After I told the officer "no," the next thing I know, bag up came with a "223" rifle. The officer with the rifle stood behind our vehicle. I had two cell phones on me, (See Exhibit W) because I had the recording on one of the phones that had no battery which was the original recording and on the other phone I had the recording on it too, (See Exhibit X) but that was a copy and the phone I regularly use. The officer, Mr. Scott began yelling at us saying, "get out the car," at least three times. (We wasn't worried about the officer reaching in and unlock the door to open it, because we had the back driver side window cracked only enough to hand out paperwork.) I then knew what they wanted, so the thought of



### 3<sup>rd</sup> of 8 <sup>IV</sup> STATEMENTS OF FACTS

me knowing what my lawyer said that could happen to me if they knew, (the commissioner and the officers that move on his word) what I had, played through my mind. (My lawyer told me to "make more copies of the recording, because if they knew I kept the only recording there is, on me they would probally crush it and crush you.") I started to get scared, so I got out of the car. The officers immediatly took my phone. I was briefly telling the owner of the vehical what was going on, over the phone when I was still in the car. What also had me even more afraid was, before I had got out the car, the owner on the phone was saying he have had the car for a few years and he never been pulled over for tinted windows. A officer was trying to make the owner report the car stolen over my phone. After I bonded out, the owner of the car told me what the officer was saying and he told the officer, "no." The officers searched the car and found consealed weapons in the trunk and consoul of the vehical. The officers then stood beside eachother in a circle like a football huddle and finally five or ten minutes later, me and the driver was placed in jail. We was released for a \$200 dollar bond with a bondsman. LPD wouldn't release my cell phones to me, nor my lawyer.

## 4<sup>th</sup> of 8<sup>th</sup> IV STATEMENTS OF FACTS

The officer lied on the report saying he smelled smoke, but they didn't find any drugs nor did they do a tent tester on the windows. After I was released I called my lawyer and asked him, "have the FBI called back yet sir?" He said, "no." Then I knew most definitely what was going on. Three months later they came looking for me with an indictment. (see Exhibit X) The FBI did not even put the event that took place on 6-5-11 because they knew it would of exposed their illegal actions. They kicked doors in and they were saying, "if he run shoot to kill." They didn't find me there, so once I was told what they were saying while they searched for me, I chosed to go to Paris, Texas out of their jurisdiction, so that I could be captured by agents that was less likely to kill me during my arrest. I was caught by an off duty officer with no resisting, nor any incident. (see Exhibit Z) The indictment has dismissed charges from my past, in which it was an illegal stop and illegal search and seizure by LPD #48 Shellie R. Kendall on Saturday, December 12, 2009 at approximately 1640 hours. The stop was more like harassment due to her sitting atleast 4 cars away from me in Inman Court waiting on me to pull off for 10 minutes. (see Exhibit A1) Once I pulled off she followed

## 5<sup>th</sup> of ~~8~~<sup>IV</sup> STATEMENTS OF FACTS

me for maybe 5 miles or more. She also falsified documents saying she smelled smoke. In the discovery it say that I'm a convicted felon, due to me not paying a fine to get a dismissed charge expunged. (see Exhibit AA) The indictment was also formed off a criminal motivated person that has been convicted of murder in the past. I'm pretty much sure Chris Wharton told the FBI agent(s) that was paying him to set people up, that I had the recording of the 3<sup>rd</sup> district commissioner, upon information of Exhibits A1<sup>2</sup>, and V, and my belief. I'm possitive that Chris Wharton Knew about it (the recording) because I told him and let him hear it myself. Chris the informant, completely entrapped me with Duress, which was the fear that he installed into my heart and mind due to him beating me up in the past, for not buying drugs for him. (see Exhibit B1) The fear also came from him being a high rank gangmember that will kill if he is dishonored. Due to all the stress and physical pain my body and mind has been through, my mind is on the road of mental abuse of being afraid for my life, knowing I'm in the hands of people that is doing life threatening organized crime. Due to me not being physically fit, I'm unable to protect myself compared to a

## 6<sup>th</sup> of ~~8~~ <sup>IV</sup> STATEMENTS OF FACTS

fit person. My right leg was shorter than my left leg, so I had six pins put in my right leg bone and six more on the other side of my right leg. Every day I had to twist the metal bar that was connected to the pins, with an allen wrench to stretch the bones apart. (See Exhibit B2, B3) The bones that was being stretched was surgically broken on the center part of my right leg below the knee cap. (See Exhibit B4) My right foot was club foot from birth, with my ankle poking out three inches and my big toe is the size of my pinky toe. My left foot toes are stuck together as if I only have three toes and the doctor removed my growing bone out of each side of my left knee cap, so my left leg will not grow longer than my right leg again. (See Exhibits B5, B6, B7) Before my current incarceration I resorted to using facebook as a public outlet before I went to Texas due to my burdensome fear for my life. In satisfying the subjective component of this matter I move further in satisfying the objective component of this Complaint.

Defendant Jeffrey, Scott showed official misconduct by intentionally, and illegally stopping Plaintiff Rivers and forcing the Plaintiff to exit the vehicle in fear. The Defendant abuse of process,

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falsified statements and illegal search and seizure reveals the Defendant State of mind and official misconduct. The 4<sup>th</sup> Amendment forbids the government from conducting "unreasonable searches and seizures." Therefore a police officer nor FBI agent can come into nor search and seizure anything in places where Plaintiff Rivers have a "reasonable expectation" of privacy which includes on your person. Due to those facts, said actions in the subjective component part of this complaint, plus the proof of Exhibits T, U, V, A1½ and W provides knowledge of the Defendant modif to cause the plaintiff the cruel and unusual punishment of unnecessary and wanton infliction of pain. The Defendant also caused the Plaintiff pain and suffering, Emotional Distress, Mental Anguish and not limiting causation of the deducted U.S currency paid to a bondsman. Therefore said actions places Defendant Jeffery Scott in violation of the 4<sup>th</sup>, 8<sup>th</sup> and 14<sup>th</sup> Amendments of the Constitution. At all times the Defendant acted under color of State law. Therefore I'm suing in the defendant individual and official capacity.

Defendant (LPD) Lebanon Police Department is over Defendant Scott therefore Defendant Scott



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is under the power of Defendant Lebanon Police Department. Due to the fact of that, Defendant Lebanon Police Department is held accountable to Defendant Scott illegal actions. Lack of training and monitoring has allowed the Defendant's employee to be involved in illegal acts and false statements that place himself in violation of the Plaintiff's rights to the Constitution. The Defendant lack of duty caused Plaintiff Rivers the cruel and unusual punishment of pain and suffering, Emotional Distress, and Mental Anguish. Thereof said action constitutes a violation of the 8<sup>th</sup>; and 14<sup>th</sup> Amendments of the constitution. At all times the Defendant acted under color of state law. I'm suing in the Defendant individual capacity.